

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRUCE SPEARMAN,

Defendant.

Case: 5:21-cr-20643
Assigned To : Levy, Judith E.
Referral Judge: Stafford, Elizabeth A.
Filed: 10/19/2021
IND USA V SPEARMAN
(LH)

Violations: 21 U.S.C § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(vi), (b)(1)(B)(i)
CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE A
CONTROLLED SUBSTANCE**

D-1 BRUCE SPEARMAN

1. From on or about July 13, 2021, and continuing to September 23, 2021, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, Bruce Spearman, did knowingly and intentionally conspire, and agree with other individuals, both known and unknown to the Grand Jury, to possess with the intent to distribute controlled substances.

2. The amount and type of controlled substances attributable to Bruce Spearman as a result of his own conduct, and the conduct of other coconspirators reasonably foreseeable to him, are:

- a. More than 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide [commonly known as fentanyl], a Schedule II Controlled Substance; and
- b. More than 100 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi), (b)(1)(B)(i); all in violation of Title 21, United States Code, Section 846.

COUNT TWO

**21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi)
POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCES**

D-1 BRUCE SPEARMAN

On or about July 13, 2021, in the Eastern District of Michigan, Southern Division, the defendant, Bruce Spearman, did knowingly and intentionally possess with intent to distribute controlled substances, to wit: more than 40 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-

phenylethyl)-4-piperidiny] propanamide [commonly known as fentanyl], a Schedule II Controlled Substance all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vi).

COUNT THREE

**21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi)
POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCES**

D-1 BRUCE SPEARMAN

On or about September 23, 2021, in the Eastern District of Michigan, Southern Division, the defendant, Bruce Spearman, did knowingly and intentionally possess with intent to distribute controlled substances, to wit: more than 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide [commonly known as fentanyl], a Schedule II Controlled Substance all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi).

COUNT FOUR

**21 U.S.C. §§ 841(a)(1), (b)(1)(B)(i)
POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCES**

D-1 BRUCE SPEARMAN

On or about September 23, 2021, in the Eastern District of Michigan, Southern Division, the defendant, Bruce Spearman, did knowingly and intentionally possess with intent to distribute controlled substances, to wit: more than 100 grams of heroin a Schedule I Controlled Substance all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(i).

GENERAL FORFEITURE ALLEGATIONS

21 U.S.C. § 853 – CRIMINAL FORFEITURE

1. The allegations set forth above in this Indictment are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the controlled substance offenses in violation of Title 21, as alleged in this Indictment, the convicted defendant(s) shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or

to facilitate the commission of such violation(s).

3. **Substitute Assets:** If the property described above as being subject to forfeiture, as a result of any act of a defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. 853(p) as incorporated by 18 U.S.C. 982(b), to seek to forfeit any property of such defendant up to the value of the forfeitable property described above.

5. **Money Judgment:** Upon conviction of one or more violations alleged in this Indictment, the United States will seek a forfeiture money judgment against the convicted defendant in an amount representing the total amount of proceeds obtained as a result of the aforementioned offenses, and/or the total amount involved in the violations of Title 21, United States Code, Section 841.

THIS IS A TRUE BILL

/s/ Grand jury foreperson

GRAND JURY FOREPERSON

SAIMA S. MOHSIN

Acting United States Attorney

/s/ Julie A. Beck

JULIE A. BECK

Chief, Drug Task Force Unit

/s/ Jihan Williams

JIHAN WILLIAMS

Assistant United States Attorney

Dated: October 19, 2021

Case: 5:21-cr-20643
Assigned To : Levy, Judith E.
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IND USA V SPEARMAN
(LH)

United States District Court
Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>JMW</u>

Case Title: USA v. Bruce Spearman

County where offense occurred : Wayne County

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint (Case number: 21-mj-30449
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:


Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 19, 2021
Date


Jihan Williams
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3277
Phone: 313-226-9520
Fax: 313-226-3265
E-Mail address: jihan.williams@usdoj.gov
Attorney Bar #: 77686

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.